

1 RAFFI A. NAHABEDIAN, ESQ.
Nevada Bar No. 009347

2 **LAW OFFICE OF RAFFI A. NAHABEDIAN**
10655 Park Run Dr., Suite 210-B
3 Las Vegas, Nevada 89144
Telephone: (702) 379-9995
4 Facsimile: (702) 222-1496

5 Attorneys for Plaintiff/Counter-defendant

6 **IN THE UNITED STATES DISTRICT COURT**
7 **FOR THE DISTRICT OF NEVADA**

8 KAL-MOR-USA, LLC,)

Case No. 2:13-cv-01046-GMN-PAL

9 Plaintiff,)

10 vs.)

11 BANK OF AMERICA, N.A., a National)
12 Association; FIDELITY NATIONAL TITLE)
13 INSURANCE COMPANY, a foreign)
14 corporation; DOES I through X; and ROE)
CORPORATIONS I through X, inclusive,)

15 Defendants.)

16 RESIDENTIAL CREDIT SOLUTIONS,)
17 INC.)

18 Intervening Defendant.)

SECOND STIPULATION TO EXTEND
PLAINTIFF'S OPPOSITION DUE DATE
TO INTERVENOR DEFENDANT
RESIDENTIAL CREDIT SOLUTIONS,
INC.'S MOTION FOR SUMMARY
JUDGMENT

19 **STIPULATION**

20
21 This Stipulation ((Second Request) is entered into and agreed upon by Kal-Mor-USA, LLC
22 ("Plaintiff"), by and through its counsel of record Raffi A. Nahabedian, of the Law Office of Raffi
23 A. Nahabedian, as well as by Residential Credit Solutions, Inc. ("Defendant"), by and through its
24 counsel of record Christina V. Miller, of the Law Firm Wright Finlay & Zak, LLP. The Stipulation
25 is entered into as a means to allow Plaintiff additional time to file and serve its Opposition to
26 Defendant's Motion for Summary Judgment. (ECF 88). The Court approved the First Stipulation
27 (ECF 90) for an Opposition due date of December 22, 2017 and a Reply Date of January 8, 2018.
28

This Stipulation (Second Request) for an additional thirty (30) day extension of time is agreed upon and entered into in good faith by the parties based on the parties continued good faith attempts to diligently resolve and settle the pending lawsuit. The proposed new due date for the Opposition is January 22, 2018, with a new Reply due date of February 8, 2018.

This additional time will allow the parties to complete their good faith negotiations, will prevent increased litigation costs and, indeed, will reduce the burden on this Court by not having to entertain or hear matters that may and can be resolved and settled in the near/immediate future.

IT IS SO JOINTLY STIPULATED:

DATED this 19th day of December 2017.

DATED this 19th day of December 2017.

By: Raffi A. Nahabedian, Esq.

By: Christina V. Miller, Esq.

Raffi A. Nahabedian, Esq. (SBN 09347)
10655 Park Run Drive, Suite 210-B
Las Vegas, NV 89144
Attorney for Plaintiff
KAL-MOR-USA, LLC

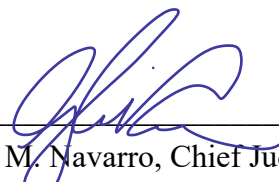
Dana Jonathon Nitz, Esq. (SBN 00050)
Christina V. Miller, Esq. (SBN 12448)
WRIGHT, FINLAY & ZAK, LLP
7785 W. Sahara Avenue, Suite 200
Las Vegas, NV 89117
Attorneys for Intervenor,
RESIDENTIAL CREDIT SOLUTIONS, INC.

ORDER

IT IS HEREBY ORDERED that the parties' Stipulation is GRANTED in part, and DENIED in part. For good cause appearing, the parties shall have an extension of fourteen (14) days from the issuance of this Order.

IT IS SO ORDERED.

Dated this 27 day of December, 2017.


Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

Respectfully Submitted By:

LAW OFFICE OF RAFFI A. NAHABEDIAN

By: Raffi A. Nahabedian, Esq.

Raffi A. Nahabedian, Esq.
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19st day of December, 2017, service of the foregoing Stipulation (Second Request) was made this date by electronically serving, through the Court's/Court Clerk's CM/ECF e-file system, a true and correct copy of the same, to the following parties:

Jacob S. Smith, Esq.
Shawn L. Walkenshaw, Esq.
HOUSER & ALLISON
3900 Paradise Road, Suite 101
Las Vegas, NV 89169
jsmith@houser-law.com
swalkenshaw@houser-law.com
**Attorneys for Intervenor,
RESIDENTIAL CREDIT SOLUTIONS,
INC.**

Dana Jonathon Nitz, Esq.
Christina V. Miller, Esq.
WRIGHT, FINLAY & ZAK, LLP
7785 W. Sahara Avenue, Suite 200
Las Vegas, NV 89117
dnitz@wrightlegal.net
cmiller@wrightlegal.net
**Attorneys for Intervenor,
RESIDENTIAL CREDIT SOLUTIONS,
INC.**

/s/ Raffi A. Nahabedian, Esq.
An employee of Raffi A. Nahabedian

RAFFI A. NAHABEDIAN
10655 Park Run Dr., Suite 210-B
Las Vegas, Nevada 89144
Tel: (702) 379-9995 / Fax: (702) 222-1496